

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA**

## **MOTION TO QUASH GARNISHMENT**

Comes now your applicant, **MONTANNA WILLIAM SMITH**, by Counsel, pursuant to Bankruptcy Code §362 (a), and respectfully represents:

1. That your applicant has filed a petition for relief under Chapter 7 of Title 11 of the United States Code;
  2. That your applicant is subject to a garnishment issued by **HARRISONBURG/ROCKINGHAM COUNTY GENERAL DISTRICT COURT, 53 COURT SQUARE, ROOM 132, HARRISONBURG, VA 22801-3700**, within 90 days of the filing of the above named petition;
  3. That said garnishment is in favor of: **CALVARY SPV I, LLC, C/O LEVY LAW FIRM CO, LPA, 4452 CORPORATION LANE, STE. 315, VIRGINIA BEACH, VA 23462.**
  4. The GARNISHEE is: **AMAZON.COM SERVICES, LLC, ATTN: PAYROLL, PO BOX 80726, SEATTLE, WA 98108;**
  5. The creditor is attempting to garnish: **DEBTOR'S WAGES.**

WHEREFORE, your applicant prays that said garnishment be quashed and have such other and further relief as the nature of the case may require.

Date: June 27, 2024 Respectfully submitted,

By: /s/ HEIDI SHAFER  
Counsel for Debtor

COX LAW GROUP, PLLC  
900 LAKESIDE DRIVE, SUITE A  
LYNCHBURG, VA 24501  
(434) 845-2600

## Certificate of Service

I certify on June 27, 2024 I have sent by postage prepaid, first class U.S. Mail this pleading to the Debtor; the Garnishee: **AMAZON.COM SERVICES, LLC, ATTN: PAYROLL, PO BOX 80726, SEATTLE, WA 98108**; the Court: **HARRISONBURG/ROCKINGHAM COUNTY GENERAL DISTRICT COURT, 53 COURT SQUARE, ROOM 132, HARRISONBURG, VA 22801-3700**; and the Creditor: **CALVARY SPV I, LLC, C/O LEVY LAW FIRM CO, LPA, 4452 CORPORATION LANE, STE. 315, VIRGINIA BEACH, VA 23462**.

/s/ HEIDI SHAFER  
Counsel for Debtor